

## **Exhibit E**

**Diane E. Accurso**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al,

**AFFIDAVIT OF  
DIANE E. ACCURSO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF TENNESSEE     )  
                                      : SS.:  
COUNTY OF HAMILTON    )

DIANE E. ACCURSO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1188 Pendall Lane, Soddy Daisy, TN 37379

2. I am currently 71 years old, having been born on May 11, 1950.

3. I am the wife of Victor L. Accurso, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from esophageal cancer on January 31, 2017. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. For 48 years, my husband and I were more or less joined at the hip and completely inseparable. When we moved from New York to Florida and then to Tennessee, we made it an adventure. We had so many mutual interests. We loved fishing, bowling, sightseeing, camping, wave running, boating, and running, just to name a few. We worked on the yard, would go to the movies, and get together with friends. We were always together, whether at

home or out. It was a wonderful marriage.

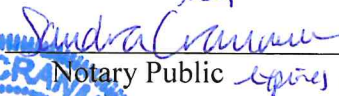
6. On 9/11, Victor was down at the pit as a part of search and recovery. It was traumatic for him, but he always maintained his composure. He met many young men working the pile that he became a mentor to because he was able to keep it together while sifting through the wreckage. I had wanted to visit Victor at the pile a couple times, but he didn't want me to go down there. He was protecting me from all the horrific things there. It was truly a bad situation for everyone.

7. Victor's illness started out inconspicuously. He had hiccups that he could not get rid of. We made the decision to go to a doctor and have his throat scoped, which revealed that he had cancer. He started radiation and chemotherapy treatments from there. The doctors tried many different treatment options, but there was no holding back his cancer. From there, things continued to get worse. Victor lost his appetite. He just couldn't eat, even though I would cook all his favorite foods. He wanted to eat, he just couldn't. He only nibbled here or there. He went from a big burly Italian man down to nothing. I was Victor's primary caretaker, and I couldn't even feed him what he liked. Finally, after a truly valiant fight, my husband passed away in January 2017. He suffered needlessly for several years, and I was there through it all.

8. I miss my husband like crazy. I miss that my grandson will never meet his grandfather. He's so much like him in many ways. I know he's watching his grandson from above. There's a lot that we still could be doing as a family. I feel robbed. I'm going to be 72 next month. We should be enjoying our lives together at this point. This is the prime of our lives and it was taken away from us. It seems unfair that so many other elderly couples get to enjoy that. It does make me feel envious. We waited our whole married life to have our house paid off and know that our kids have grown up happy and healthy. This should have been our time, and Victor's illness and untimely death took it away from us.

  
DIANE E. ACCURSO

Sworn to before me this  
2<sup>nd</sup> day of April, 2022

  
Notary Public expired 6/24/2023





**Victor Louis Accurso Jr.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al,

**AFFIDAVIT OF  
VICTOR LOUIS ACCURSO, JR.**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF TENNESSEE     )  
                                      : SS.:  
COUNTY OF HAMILTON    )

VICTOR LOUIS ACCURSO JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1188 Pendall Lane, Soddy Daisy, TN 37379.

2. I am currently 51 years old, having been born on February 9, 1971.

3. I am the son of Victor L. Accurso, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from esophageal cancer on January 31, 2017. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I did everything together. We were both in the fire service, and we loved to hunt and fish together. My dad is the reason I got into the fire service. When we lived in New York and then in Florida, he was with the fire department, and I would do calls with him as a fire department EMT. I was a fire department paramedic down in Florida, and now here in Tennessee.

6. It was very difficult for my dad to talk about 9/11, so he didn't say too much about it to me. But when he did, he described the horrific conditions and the awful stench of carcinogens in the air, which he was breathing in daily. My dad worked in the pit where the towers collapsed, looking for civilians and his brother firemen. He said it was a gruesome and eerie sight. He responded to the World Trade Center site on the day of 9/11, and he worked there for several weeks before they released him to come home.

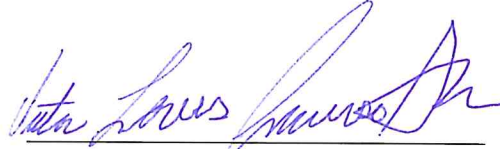
7. When my dad was diagnosed with esophageal cancer, my mom called to tell me. I was in a complete state of shock. Over time, I watched him go from a physically fit and healthy person to a seriously ill man. He underwent chemotherapy infusions and radiation. He had a port in his chest to keep his veins from collapsing from the strong chemotherapy. These treatments, and the disease itself, took a toll on his body. It also broke my heart.

8. I was living in Florida with my wife and son when my dad got sick. My parents were living in Tennessee. I left work in Florida and traveled back and forth to Tennessee to take care of my dad. I had to take several months off from work, including both FMLA and sick days. It was hard for my mom to take care of my father by herself, so my wife and I would take turns helping out. One of us would look after our young son in Florida, while the other took care of my father in Tennessee. I would meet my wife at the airport, and we would swap car keys and house keys. It was an extremely stressful time. At the end of my father's life, I was in Tennessee until he took his last breath. Because I am a paramedic, I administered his medication. I helped him stay comfortable and watched him throughout the night. We set up his hospital bed in the living room, and I slept on the couch next to him.

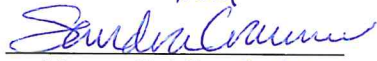
9. It was heartbreaking watching my dad battle cancer. Since my father's death, it's been hard not having him around. It was comforting to be able to reach out to him anytime I wanted to and now that's not possible. I had to move my family to Tennessee to look after my mother. My father's death has been especially hard on her. She suffers from diabetes and had a heart attack right in front of me in the house. It's been a rollercoaster ride ever since my father got sick. I made a promise to my father on his death bed that I would always take care of my mother, a promise I will always keep.

10. My father taught me a lot, so much more than I realized until I got older. When you're young, you don't realize how much your father teaches you about life. He was a true role model on how to treat your spouse as well as other people. He inspired me to join the fire

service. He taught me how to hunt and fish, which are traditions I've passed down to my own son. As I mentioned, he's not here anymore to pick up the phone. He was always there if I needed an answer for something or if I just wanted to hear his voice. I so often wish I could speak to him again. I truly miss him.

  
VICTOR LOUIS ACCURSO, JR.

Sworn to before me this  
4<sup>th</sup> day of ~~April~~<sup>May</sup>, 2022

  
Notary Public *expires June 24, 2023*



**Alexis Daniel Guichardo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF**  
**ALEXIS DANIEL GUICHARDO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NEW YORK    )

ALEXIS DANIEL GUICHARDO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 70 Amsterdam Avenue, Apt 6G, New York, NY 10023.

2. I am currently 38 years old, having been born on February 16, 1984.

3. I am the son of Steven J. Acevedo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from liver cancer on November 16, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was heavily involved in my life. He raised me. I was his right-hand man. He taught me how to be a man, taught me values, and showed me right from wrong. I followed in his footsteps by joining the military. He was extremely present in my life.

6. I know that my father was ordered to respond to the World Trade Center site on September 11, 2001. He was in the New York State Army National Guard. We lived in the city, and his unit was based in Jamaica, Queens. He first went down to the disaster site after the



towers fell. I am also in the military, so I know what my father went through when he was down there. His role was hands-on. He was searching for survivors, but mostly pulling people out of the rubble and providing medical aid if necessary. He was there for a few months working on recovery and clean-up operations. I remember that he was gone from home a lot and would only come home every couple of days.

7. My father kept his illness a secret from us, or at least from me. I had an idea that something was wrong with his health, but I didn't learn about his illness until he was diagnosed with liver cancer. As I grew up, I idolized my father. He was a strong, take-charge person, and the leader of our family. To see him wither away was excruciating for me. His normal persona slowly declined. He needed my help doing simple tasks like lifting things and driving places. Slowly, he was getting weaker, mentally and physically.

8. During the course of his illness, I was stationed at Fort Dix in New Jersey. My dad was in New York City, and I would constantly go to visit him at the hospital. I spent time with my family, helping my mom out. I wanted to spend as much time with him as I could, which was difficult because I had to be at work. His illness caused me to be angry and depressed. It totally tore our family apart. My father was the leader, the glue that held our family together. It just felt horrible knowing that he was dying. The realization that I wouldn't have his leadership to look to anymore made me feel completely lost.

9. All I can say is, what a great tragedy it is that the attack on the World Trade Center happened. It impacted our lives beyond measure, as well as the lives of countless other families. To this day, my family still hasn't recovered from my father's death. The man we looked to for guidance and advice is gone. My mother has never recovered from his death, and she never will. His death affected my life tremendously. I try to live my life in his image. I joined the military to follow in my father's footsteps, risking my life for our country. I try to do the things he would've done if he were here.

10. I know that no amount of money could ever bring my father back. What's been taken away from us is gone, and it's never coming back. But I believe that we've suffered a

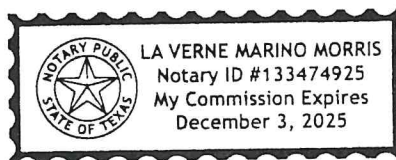


horrible fate in losing my father at a young age. There should be some measure of justice for that.

  
ALEXIS DANIEL GUICHARDO

Sworn to before me this  
23rd day of April, 2022

  
Notary Public



**Marilyn Guichardo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF MARILYN  
GUICHARDO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF FLORIDA       )  
                                  : SS.:  
COUNTY OF OSCEOLA    )

MARILYN GUICHARDO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1081 Quaker Ridge Lane, Davenport, FL 33896.
2. My current age is 64, having been born on February 21, 1958.
3. I am the wife of Steven J. Acevedo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from liver cancer on November 16, 2016, at the age of 58. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Steven and I did just about everything together. We went on walks, went out to the movies, went out to dinner, and went to social gatherings. Steven was in the military, so I was involved in his military and police life with his friends.

6. I was home on September 11, 2001. Steven was in the Army National Guard at the time. He told me that military orders had been activated and that he would be going down to Ground Zero to work on the search and recovery operations. He responded for a total of 21 days, starting on September 12, 2001. He was down there looking for bodies in the rubble.

7. I was very angry at myself for years for not catching his illness earlier. He always told me, "Marilyn, I have agita. Do you have some Mylanta?" I never thought about those pains as anything serious. We moved from Manhattan to Westchester, because he said he wanted to retire soon. I didn't know it at the time, but really it was because he didn't have the energy to live in the city anymore. Whenever I came home from work, he'd either be sitting on the couch or sleeping. I figured it was because he was getting older and working overtime. But no, he was dying. He would tell me, "Marilyn, I'm not going to make it to 65." I would say, "Steven, what are you talking about?" He knew I didn't like Westchester and that I wanted to move back to the city. So, we drove into the city looking for apartments. His friend's father had recently passed, and he had owned an apartment in NYC. He said he could make it work. So, we moved into that apartment on July 1, 2015.

8. A few weeks into living in the new house, I walked in on him in the bathroom spitting up blood. I was shocked. We made a doctor's appointment at the Bronx VA Hospital. The doctor called me and said, "His liver numbers are high. How long has your husband been drinking?" But he was never a drinker. The doctor told me he needed to come in for a CT scan. He had cirrhosis of the liver in one corner. They ran more tests. I wanted him to take my liver for a transplant. But they couldn't take it—his arteries and veins were all deteriorating too rapidly.

9. The doctor said, "Marilyn, go home, walk your dogs, and then come back to the hospital." I called my work to tell them I was taking FMLA. The doctors said they were going to admit him and make him as comfortable as possible. They passed him off to the palliative care team. It all happened so fast. He was diagnosed with liver cancer in August 2016, admitted to the hospital in September, and he died on November 16<sup>th</sup>. I lived with him in the hospital for the last six weeks of his life. I was in denial. Steven was only 58 years old. He was supposed to retire, and we were going to go on vacations, cruises, walk on the beach, love, fight, and be together for the rest of our lives.

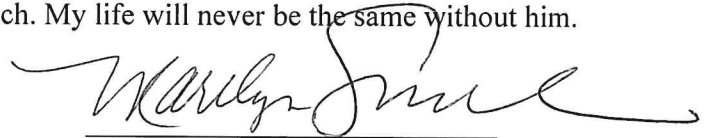
10. I took care of Steven while living with him in the hospital. I would bathe him, change his clothes, talk to him, hug and kiss him, and laugh with him. We settled all of our differences. I took him out to the hospital's garden to get some fresh air. One day, I came into the hospital, and I didn't see him in the bed. My heart dropped. But his friends from work were there, with him in the hallway, and they were helping him stand up. He wanted so badly to stand. He didn't want to give up. Steven's hospital room was crowded every day, with grown men crying at the foot of his bed. That was the impact that he had—he was an inspiration to so many people. I couldn't believe the outpouring of love that my husband's friends had for him.

11. Before his death, he just laid there and stopped talking. He was very quiet. One day, I looked at him and said, "Steven, I'm here." He was just staring, but he couldn't see me. I knew that his death was coming soon. I held his hand, kissed him and climbed into the hospital bed with him. That's when he took his last breath. I didn't want to let go.

12. It was hard after Steven's death. I didn't realize how expensive everything would be with no money coming in. Car insurance, rent, cable, phone bills, groceries, MetroCard, all these things. Steven was making more money than I ever did. I ate peanut butter sandwiches for months after he was gone. I lost my health insurance for two years. All I could pay for was the rent and the MetroCard. I was helping out my two sons financially at the time, but they didn't know I was struggling. I did what I had to do. I just prayed that I wouldn't get sick. We were all grieving, and I didn't want my sons to worry about money.

13. Steven shouldn't have died. He was a brilliant, educated man. He had a master's degree, spoke three languages, and traveled the world. He was a soldier...he went to war so that we could have the liberties we have today. Steven would give you the shirt off his back. He was a good soul. When he was responding at Ground Zero, he gave other soldiers his cot to sleep on when they didn't have one. He never thought of himself, he thought of others and his family first. This should've never happened. He shouldn't have died and left us alone. But he left a legacy, and I'm very proud and aware of his legacy. His legacy is the relationship he had with his sons and the knowledge he shared with them. Sometimes, my sons will say something, and I'll think, "Wow, that's Steven right there." I see Steven in both my sons. Maybe they don't

realize it, but I do. I miss my husband so much. My life will never be the same without him.



MARILYN GUICHARDO

Sworn to before me this

18 day of April, 2022

  
Notary Public **NORMAN RUSCETTE**

NORMAN RUSCETTE  
NOTARY PUBLIC  
STATE OF FLORIDA  
Comm# GG933291  
Expires 12/7/2023

**Setevenicholas Guichardo**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

Plaintiffs,

**AFFIDAVIT OF  
STEVENICOLAS  
GUICHARDO**

v.

20-CV-00315 (GBD)(SN)

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NEW YORK    )

STEVENICOLAS GUICHARDO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 217 West 62<sup>nd</sup> Street Apt 5A, New York, NY 10023.

2. I am currently 30 years old, having been born on September 14, 1991.

3. I am the son of Steven J. Acevedo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from liver cancer on November 16, 2016, at the age of 58. It was determined by the World Trade Center Health Program that his cancer was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Growing up, I didn't realize how much I cherished my relationship with my father until after he passed. He was a good man. He was a good father to me. He taught me a lot of lessons, and I was grateful for him. My father served in the military and went on tour in Iraq. When he came home, he brought my mother, my brother, and me on a trip around the United States. He wanted to show my brother and me the world. We would always play basketball together. My dad grew up without a father of his own, so he wanted to pass on life lessons to

my brother and me because he never had that. My father helped me become the man I am today.

6. At the time of September 11, 2001, I was in third or fourth grade. We were living in upstate New York at the time. My father explained to me and my brother that he was placed on active duty on 9/11/2001. I remember going with him to a military depot so that he could purchase equipment for himself to respond to the World Trade Center site. He bought a blue emergency light and siren for his car so that he could drive it past the National Guard trucks into the disaster zone. He drove his 2000 Dodge Durango from our town in Newburgh, NY, down to the World Trade Center site. I remember that he brought back an American flag from Ground Zero that all these first responders had signed. He was gone for multiple days at a time. He was always going back and forth.

7. Years later, I noticed that my father's attitude had started to change. Every time we spoke, he always mentioned that he "might not be here one day." I was curious why he was speaking like that, as he was more sentimental than usual. One day, my mother called me while I was at work. I was working as a barista in Manhattan. She told me, "Your father isn't doing well, you have to come see him." I rushed to the VA Hospital in the Bronx. He was in the hospital, coughing up blood. They had just diagnosed him with liver cancer.

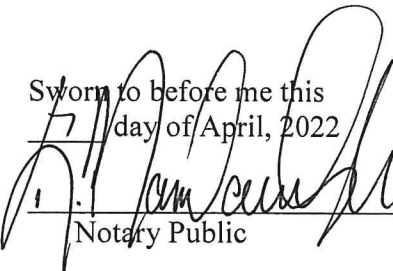
8. I used to work twelve-hour shifts at a small business before spending the night with my father at the hospital every night. Either my mother or I would be by my father's side at the hospital, every night. If there was a scare, I had to leave my job at a moment's notice. For a couple months straight, I went to stay with him at the hospital, every weekend for the entire weekend. Every free moment that I had, I spent with my father.

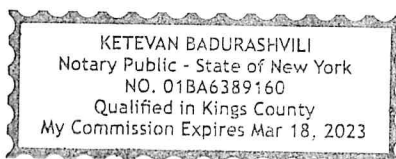
9. I didn't realize how much stress it brought me until things started to get worse and worse. His illness was a horrible thing to witness. To see my role model, my guide, and the strongest person in my life suffer, it was terrible. It really impacted my life, made me think about my own mortality and all the lessons that my dad taught me. I went through therapy after his death. It was a huge emotional ride. Even now I still have bad days.

10. What happened to my father was a tragedy, to say the least. I wouldn't wish that on anybody ever, even my worst enemy. I live every day in my father's memory. He was a hero and a patriot. He loved his country, and he served his country faithfully through many wars and

hard times. He never asked for anything in return. He was the greatest man in my life. If I am half the man he was, it will be a life well-lived.

  
STEVENICHOLAS GUICHARDO

Sworn to before me this  
17 day of April, 2022  
  
Notary Public



**Kristine Achong**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
KRISTINE ACHONG**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF OCEAN        )

KRISTINE ACHONG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1225 Curtis Avenue, Point Pleasant, New Jersey 08742.

2. I am currently 32 years old, having been born on March 3, 1990.

3. I am the daughter of Charles William Achong, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from prostate cancer on March 29, 2018. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I'm an only child and was a daddy's girl. My father and I did everything together. We loved to travel. He helped me with everything from school, to learning how to drive a car, to learning how to cook. He taught me everything I know. He was everything to me.

6. My father was an active-duty FDNY firefighter. On 9/11/2001, he picked me up from school and told me he had to go down to the World Trade Center. I was pretty young, so



he shielded me from a lot of the details. I didn't fully understand what was going on at the time. He told that something bad had happened and that Daddy had to go help. I had no idea what terrorism was. My dad worked at Ground Zero for many of days. We lived on the beach in New Jersey, and my mom took me out to the beach after I returned home from school that day. As I looked out on the water, I could see the smoke cloud over New York City.

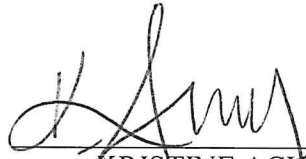
7. I learned of my father's prostate cancer diagnosis in late 2017. I wasn't living at home when he was diagnosed, so my parents called me to come over. They sat me down and told me the news. I was completely shocked. My dad was never really sick. He always took care of himself. He was active and loved to ride his bike and play golf. Even in his retirement, he flourished. When he became ill, I would take him to chemotherapy appointments at a facility in Middletown, New Jersey. He went for many chemo treatments, wherein he would get the chemo injected intravenously. He was a big guy, about 6'4", and it was heartbreaking for me to see him become so frail and weak. He was never very emotional or a big talker, but I could tell he was scared. He didn't like attention, and the whole process of being a hospital patient was hard for him.

8. I would try to help my dad as much as I could. I would bring his favorite foods over to my parent's house in hopes that he'd eat something. I would help my mom out with the cleaning and cooking. I drove him places and to his doctors' appointments. My dad started deteriorating pretty rapidly after he was diagnosed. He lost all his hair and his mustache to chemotherapy. I went out and got a fake costume mustache, just to make him laugh. I wanted to spend as much quality time with my dad as possible before he passed.

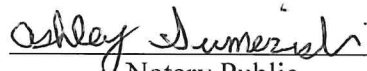
9. I don't even think there are words to describe the way I felt after my dad passed. My world was shattered. My father was my rock, my teacher, my role model, and my travel buddy. We would do everything together. After his death, I shut down for quite a while. My family wasn't big on communicating or expressing our feelings, so it was hard for me to handle the grief after he died. I lost control of my life for a while, and my work quality started to slip. I was in a really bad place. I never thought my dad would be gone.

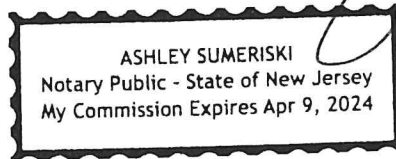
10. I was so young when my dad passed away, only 28 years old. I thought about all the things my dad would miss. I know he would have been a wonderful grandfather. I'm getting married in a couple of months, and I never pictured a wedding without my father there to walk

me down the aisle. I feel so sad for my mother now that her best friend is gone. The house seems so empty. I think about him all the time—all day, every day. I talk to him in my mind as if he's still here, because I have to believe he's still here, watching over me. But my world is shattered and will never be the same without him.

  
KRISTINE ACHONG

Sworn to before me this  
12 day of May, 2022

  
Notary Public





**Rosemary Achong**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
ROSEMARY ACHONG**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF MONMOUTH)

ROSEMARY ACHONG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2004 Parkview Terrace, Spring Lake Heights, NJ 07762.

2. My current age is 66, having been born on October 23, 1955.

3. I am the wife of Charles William Achong, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from prostate cancer on March 29, 2018. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Charles ("Chuck") and I were married for forty years before he died. He was very active and loved to golf. We traveled extensively. We were very, very close—he was my best friend. We led active and busy lives before Chuck got sick.

6. Chuck worked for the Jersey City Fire Department. They all went down to the World Trade Center as volunteers. They worked for days on the pile, until they couldn't find any more survivors. He was traumatized by the experience. He wouldn't talk about it because it was so horrific.

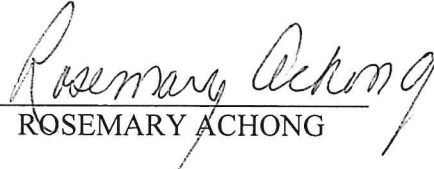
7. I noticed that Chuck started to slow down a bit. He fatigued more easily. His energy level wasn't as high as it usually was, and he told me he was having lower back pain. Being a typical male, Chuck wouldn't go to the doctor. I'm a registered nurse, and I noticed that he had an enlarged prostate. I told him he needed to go to the doctor. They ran a PSA test on him. A normal PSA level is around 4.0, and Chuck's PSA came back at 192. He was diagnosed with prostate cancer a week later. It was a death sentence. He was diagnosed in July 2017 and died within eight months. By the time we found out about his diagnosis, his prostate cancer had already metastasized.

8. He got chemotherapy at Sloan Kettering starting in September 2017. That stopped at the end of December 2017, because the doctors saw that it wasn't working. At that point, his cancer was getting worse. He passed in March 2018. It was an awful experience. Watching him die was horrible. His condition deteriorated extremely quickly. He was in a lot of pain. Knowing that I couldn't help him, even though I'm a registered nurse, was horrible. I cried every time that I looked at him. I don't wish the pain he went through on anybody.

9. I took Family Medical Leave Act (FMLA) time off for his chemotherapy treatments and toward the last month of his life. I would take vacation days and sick days to stay home and look after him. I wish I took more time off to be with him. I didn't realize how little time we had left together. We all have to lose someone at some point in life, but this was devastating. I watched him go so quickly.

10. Chuck's life ended way too early. He was only 67 years old. I was getting ready to retire, but we shouldn't have waited. We lost the opportunity to travel the world together. We have a daughter, and she's getting married this summer. He won't be able to walk her down the aisle. She found a fire truck that will carry her to her wedding. She's finding ways for him to be

involved in her life, even though he's not here anymore. We miss Chuck, and it saddens us that he had to die that way.

  
ROSEMARY ACHONG

Sworn to before me this  
8 day of April, 2022

  
\_\_\_\_\_  
Notary Public

KIMBERLEE S. FARRO  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Dec. 10, 2024

**Daniel Peter Armenta**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
DANIEL PETER ARMENTA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA )  
: SS.:  
COUNTY OF SAN MATEO )

DANIEL PETER ARMENTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 236 Taylor Boulevard, Millbrae, California 94030.

2. I am currently 32 years old, having been born on January 19, 1990.

3. I am the son of Daniel Victor Armenta, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic bladder cancer on November 25, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was, is, and will always be a hero of mine. We had an amazing relationship. We shared a lot of interests, especially when it came to business. My dad and I were both into real estate. I was a practicing realtor for two years because of him. We had very similar personalities. He was one of the most important figures in my life. If I'm a good person, it's because of my father.



6. I was probably in the sixth grade on 9/11. When my father learned of the attacks on the World Trade Center, he immediately flew out to New York. He was there for at least two weeks, maybe more. Possibly a month. My dad was helping to dig through debris to rescue survivors and recover victims at Ground Zero. My father was a first responder with the San Francisco Fire Department and went to Ground Zero as a volunteer with eleven of his friends from the fire department. I remember the day he arrived home from New York. He was sitting in our house, talking to my mom, grandma, and brother about his experience. He wasn't someone who cried easily. He was more emotionally reserved. But he was in tears that day describing the horror he saw. That always stood out to me. When I saw him crying, describing the state of it all, that really stayed with me.

7. After a trip to Europe, my dad started to experience some bladder/urinary tract issues, which led him to seek medical attention. At first, one of the practitioners he met with thought it could be bladder cancer, but then was optimistic that it wasn't. My dad sought a second opinion at UCSF Hospital, where he was diagnosed with abnormal bladder cancer. The doctor, a renowned specialist, said that my dad had one of the rarest cancers they had ever seen. It wasn't just the size and shape of the tumor but also the placement of it. It was between the bladder and the kidney. My dad went through chemotherapy and radiation. Because of the location of the tumor, he couldn't urinate regularly. He had an emergency surgery 2-3 months after his diagnosis to have tubes placed directly into his kidneys, which would filter out urine. The doctors created a stoma that fed into a urine bag, so that the urine could be removed from his bladder.

8. My mom, my brother and I all took care of my father. I was living at home, so I took care of my dad a lot. My aunts and uncles would come to help also. The two bags connected to his kidneys required a lot of cleaning. Every day, I would remove the bandages around the incisions, help my dad shower, put cream on the incision area, and put on a new bandage. I would monitor if he had a fever and would administer his medication. I would always look after him when he had chemotherapy. Those days became more intense, especially as we got closer to his passing. There was a lot of pain maintenance. When things took a turn for the worse, there was a lot of back-and-forth to the hospital.

9. I always had to take time off work to take care of my dad. I would accompany him to chemotherapy sessions with my mother every Tuesday. At the time, I had just graduated college and was working for a hotel in the sales department. Fortunately, they accommodated my schedule.

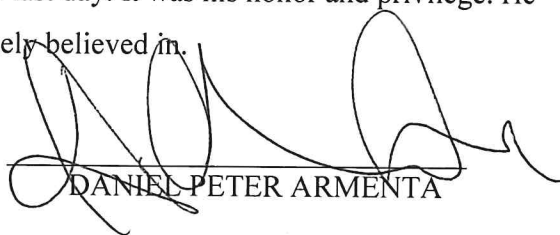


I wanted to be able to go with my dad every week to chemotherapy.

10. It's the worst feeling to lose your father. I think anybody who has lost someone they loved has felt this way. There aren't enough words to explain the pain, the trauma, which sticks with you always. It'll always exist and never go away. There's a part of my heart that I can't fill. I can never replace him in my life. For at least a year or two after his death, I was adapting to a new life. I had just graduated college and was excited for the summer after, but with my dad being diagnosed with cancer, I felt like I couldn't be a young person anymore. I had to be an adult. I had to be a source of strength for my mom and brother. All fun and games went out the window. Eventually it all came back, but for about two years after his death, I was going through it. I lost my childhood in a way. I had to grow up. I'm a totally different person because of my father's death.

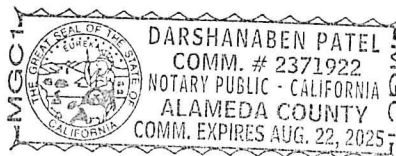
11. I'm always proud and happy to talk about my dad, his accomplishments, and what he did with his life. I can say this with the sincerest heart: my dad believed in his work and his duty. Even without direction from the San Francisco Fire Department, he went down to Ground Zero to help. My dad was a leader, with a passion and desire to make a difference. A fellow fireman, no matter whether they were in New York or California, was his family. He would step in and help no matter what. I remember him coming back in tears after the horror he witnessed. But he had a calling to do something, to be someone. He would've done it again and again, without any recognition.

12. On his last day alive, he told my mom he would do it all over again. My dad was aware that his cancer was related to 9/11. He also knew that smoke inhalation, debris, and hazardous materials were risks in his profession. He knew that could be part of his life. My dad had also been hurt on the job while trying to protect others. He always had a calling. It was what he was meant to do. He wanted to aide others until his last day. It was his honor and privilege. He would do it again and again. It was what he genuinely believed in.

  
DANIEL PETER ARMENTA

Sworn to before me this  
12 day of June, 2022

D.A. Patel  
Notary Public



**Doris Armenta**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
DORIS ARMENTA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA )  
: SS.:  
COUNTY OF SAN MATEO )

DORIS ARMENTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 236 Taylor Boulevard, Millbrae, California 94030.

2. I am currently 65 years old, having been born on May 3, 1957.

3. I am the wife of Daniel Victor Armenta, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic bladder cancer on November 25, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband was my rock. He was my everything. He was the foundation of our family—not only our immediate family, but also my brothers, my mom, everyone. Everyone went to Dan. He was like the godfather of the family. Dan and I had a very good relationship. We loved vacationing together with our children. My husband loved life and his family. He lived every day to the fullest. Daniel helped everyone; he always gave to others. There's a big void in our lives now, a huge emptiness. Even after eight years. It's a new way of living. A

different life.

6. As soon as my husband learned of the World Trade Center attacks on 9/11, he flew from California to New York. He was a Lieutenant fireman with the San Francisco Fire Department. Dan and eleven of his fireman friends flew to New York to help on the pile. I didn't want him to go, because I was worried that it wouldn't be safe. But Daniel insisted that he had to go. That's the kind of person he was. He had to help. He knew many people in the FDNY and had friends who perished in the collapse of the towers. I want to say he was there for a total of three weeks to a month. When he came back, it was quite an adjustment. He told me, "If I knew what hell was like, I'd call it hell." He said it was hard, very hard. He would see children's shoes in the pile. He would find a body part here and there. He said it was like nothing he could imagine in his whole life. It was very difficult for him.

7. In May 2013, Daniel was complaining that he didn't feel well. We went to see several doctors. Dan was misdiagnosed the first time. We opted to get a second opinion at UCSF, where they performed several CAT scans, blood work, and other types of testing. The Head of Oncology at UCSF told us Dan had a very rare bladder cancer and that it was already in its advanced stages. Dan had surgery to try and remove the tumor, but they couldn't get all of it. The doctor said that his cancer was everywhere and that it had spread extremely quickly. Dan underwent chemotherapy, which destroyed his body. It was devastating, but he was a fighter. He never gave up until the very end, when the doctors said there was nothing more they could do for him. At that point, I did everything I could do to make him comfortable.

8. My time commitment to taking care of my husband was 24/7. I did everything—took care of the kids, the household, the property, and nearly all of my husband's medical needs. My kids helped me too, but we were really lost without Dan. He had tubes in his kidneys which we had to cleaned. We helped him with his urinary bag, showering, and giving him shots.

9. I was working at a restaurant part-time, and I had to quit to take care of my husband. My job didn't contribute significantly to our income, and my husband was really our sole provider. When he got sick, we had to pay for whatever insurance didn't cover. It was difficult and stressful. Toward the end, I had in-home nurses come in that I had to pay for out of pocket. It was more like hospice care, but sadly, I didn't know it was hospice care at the time. It was hard to handle everything that was happening all at once. We ended up rushing him to the hospital one morning, and he never came home.

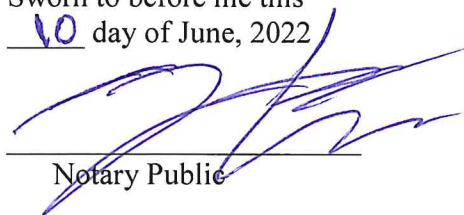


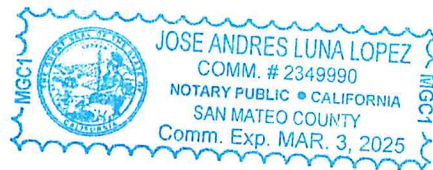
10. Emotionally, it was crushing. Dan was a trooper. I never gave up on him. I wanted the doctors to do everything they could to help him. It was like one step forward, twenty steps back. We were always waiting for hope that it would be okay, but it never was. His death was life-changing for me. It was very hard. Sometimes, I relive it all over again. My kids were in their twenties at the time, and it was devastating for them to lose their father at such a young age. My husband was only sixty-three years old when he died. He had just retired. We had so many plans after his retirement. We wanted to travel and do a lot more things together. He worked a lot and deserved to have a happy retirement. He was so hard-working. He retired from the San Francisco Fire Department as a Captain. He's missing out on so much that I wish he was here to share with me. We had just had our first grandchild, and she is now a month old. Our youngest son is just now getting married in September. He should be here with me, experiencing it all with me. Instead, I am alone. It hurts. There's a great impact on my life, a great void. I've never re-married or dated. Nor do I ever have the desire to. I get asked that all the time, but I don't want anyone else to tell me how I should live my life.

11. I never want Dan to be forgotten. He should be remembered. He is in the 9/11 Memorial. His picture is there. His picture is also on the limited-edition MetroCard of 9/11 first responders. They were sent to me when they came out. My husband was a man who gave his life to help others. He went to the World Trade Center that day to help people. He told me he had no regrets and that if he had to do it all over again, he would. He would go to Ground Zero tomorrow, because that's the kind of person he was. He was a true, true first responder, in every sense of the world. He gave his life for others.

  
DORIS ARMENTA

Sworn to before me this  
10 day of June, 2022

  
Notary Public



**Martin Armenta**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
MARTIN ARMENTA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA )

: SS.:

COUNTY OF SAN MATEO )

MARTIN ARMENTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 560 Alvarado Street, Brisbane, California 94005.

2. I am currently 34 years old, having been born on January 22, 1988.

3. I am the son of Daniel Victor Armenta, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic bladder cancer on November 25, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was the best man in the world. He was the best father I could ever have asked for. Everyone went to him with their problems. He would be at every family event and attended all of my basketball games. He took me, my brother and my cousins everywhere. I loved when we would visit him at work at the San Francisco Fire Department. The Fire Department was a second home for us. Overall, he was an amazing man, husband, father, brother, uncle and friend. You would never hear anyone say anything negative about him. His

praise was very well-deserved, and he was well-respected.

6. When the September 11<sup>th</sup> attacks happened, my brother and I were getting ready for school. My mom had the TV on, and we saw footage of the planes hitting the World Trade Center on the news. My dad had friends who were in the FDNY and perished in the collapse of the towers. He was also close friends with Kevin Gallagher, a Captain in the FDNY. He and eleven of his friends from the San Francisco Fire Department took the first flight they could to New York. They paid for the flights with their own money. My dad arrived at Ground Zero on September 18<sup>th</sup> and worked there for about seven to ten days. He dug through the rubble, searching for victims and personal affects. He wanted to do anything he could to give the families of victims some closure.

7. I was young when 9/11 happened, but a few things stood out to me. My father told me that if the same type of attack ever happened in San Francisco, he would tell us that he loved us and would be first on the scene to respond. He also told me about the search and rescue dogs and how he would go with them into small spaces in the rubble to search for victims. My father wasn't an emotional man, but I once heard him crying on the phone to my mother when he was at Ground Zero. He had stopped in the middle of the pile to call her. He looked to his left and saw a pillar that said "99<sup>th</sup> Floor." He was really in the thick of things.

8. Around the time my father was diagnosed with bladder cancer, I was living in San Bruno and working for the Public Works Department. I was working on a construction project with my dad when he complained to me that his stomach hurt and that he was having a hard time urinating. He also was having some issues with mobility. I remember that we had taken a family trip to Europe in late 2012, and he was moving around pretty slowly. I just figured he was getting older or that he was tired from working a lot. I didn't realize the pain he was really in. On May 6, 2013, I got a call from dad after getting home. He called to tell me that he hadn't been feeling well for about a month and that he went to the doctor and was diagnosed with bladder cancer. He sounded very positive, telling me, "Martin, it's alright, I'll get through this. We're going to attack this thing head on." I talked to my mom later that night, and she was a nervous wreck.

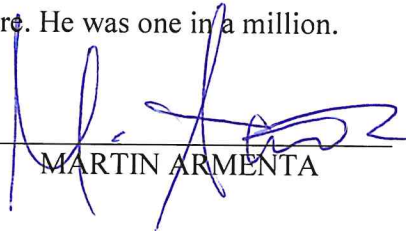
9. My father never complained. He never asked, "Why me? Why not somebody else?" He was a very healthy man, so I was surprised to learn of his cancer. He ran two and a half miles every day, played basketball well into his sixties, and never smoked or had a sip of

alcohol. He lived a very active lifestyle.

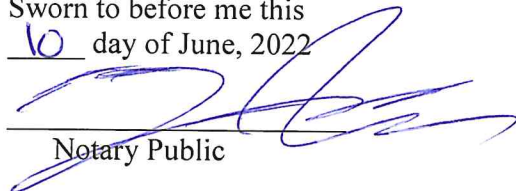
10. My dad went through two or three operations to remove or reduce the tumor, but none of those operations were able to remove his cancer fully. It was out of control and spread very quickly. I know my father went through chemotherapy and radiation, and he was making some headway with the treatments. He was at UCSF Hospital for the treatments, and I would visit him in the hospital. My mother, brother, and I all contributed to his care. I would change his urine drainage bags for him because he couldn't urinate on his own. If he needed help getting up, I'd help him. If he wanted to go out for the day, I'd help him into the car, no matter how long it took. I saw my dad every day after work, even just to do something as simple as watch sports on TV with him. I often had to miss work to take care of my father or visit him at the hospital.

11. His cancer was really a shock to me. His illness progressed so quickly, and within six months he was gone. It was a huge blow to my world. He was the guy I went to for everything. To me, my dad was my best friend. He was my hero. I'm thirty-four and I still say that I want to be like him when I grow up. When I lost my dad, I lost my whole world. To see my mom go through grief, she was so sad. It really hurt. As the oldest son, I became the man of the house when my father passed away. I had big shoes to fill after he died. I try my best every day, and I hope that my father is watching over me.

12. Anyone who met my father would never say a bad thing about him. I have a daughter now, and I wish my father was here to meet her. I wish he was here for my brother's wedding. I really wish my mom had someone to enjoy life with. I wish he was around to be there for his friends in the San Francisco firehouse too. I just know if he was still around, he would be cherishing every moment of his life. He was something special. In a word, he was amazing. There are not a lot of people like him out there. He was one in a million.

  
MARTIN ARMENTA

Sworn to before me this  
10 day of June, 2022

  
Notary Public

